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16 UNITED STATES BANKRUPTCY COURT
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18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 In re
21 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

22 Debtor and
23 Debtor in Possession.

Case No. 23-30564

Chapter 11

**NOTICE OF HEARING ON DEBTOR'S
FOURTH MOTION FOR EXTENSION OF
DEADLINE FOR REMOVAL OF CIVIL
ACTIONS [28 U.S.C. § 1452 AND
BANKRUPTCY RULE 9027]**

25 Date: May 8, 2025
26 Time: 1:30 p.m.
Location: Via ZoomGov
27 Judge: Hon. Dennis Montali

1 **NOTICE IS HEREBY GIVEN** that The Roman Catholic Archbishop of San Francisco,
2 debtor and debtor-in-possession herein (“Debtor”), has filed a *Fourth Motion for Extension of*
3 *Deadline for Removal of Civil Actions* [28 U.S.C. § 1452 and Bankruptcy Rule 9027] (the “Motion”)
4 and that a hearing on the Motion is scheduled on May 8, 2025 at 1:30 p.m., at the United States
5 Bankruptcy Court, Northern District of California, San Francisco Division, before the Honorable
6 Dennis Montali (the “Hearing”). The Hearing will not be conducted in the presiding judge’s
7 courtroom but instead will be conducted by videoconference via ZoomGov. The Bankruptcy Court’s
8 website provides information regarding how to arrange an appearance at a video or telephonic
9 hearing. If you have questions about how to participate in a video or telephonic hearing, you may
10 contact the court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy
11 Court’s website. The link to the judge’s electronic calendar is:
12 <https://www.canb.uscourts.gov/judge/montali/calendar>.

13 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of Joseph*
14 *J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [ECF No. 14], the
15 *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency Motions*
16 [ECF No. 15], the pleadings and papers on file in this case, and such other evidence and argument
17 as may be submitted before or during the hearing on the Motion.

18 As noted in the Gaspari Decl. and Passarello Background Decl., the Debtor is informed and
19 believes that approximately 537 complaints have been filed in the Joint Coordinated Proceeding No.
20 5108 pending in Alameda Superior Court, although the RCASF may not have been served with all
21 of them yet. The Debtor has filed its Schedules and Statement of Financial Affairs identifying each
22 of the actions of which the Debtor was aware as of the initial schedules filing date of September 21,
23 2023. See ECF Nos. 152 and 153. The Debtor may become aware of other complaints hereafter
24 (such actions, together with any other civil action to which the Debtor is, or may become, a party,
25 collectively, the “Civil Actions”). By the Motion, the Debtor is requesting the Court to enter an
26 order pursuant to 28 U.S.C. § 1452 of title 11 of the United States Code and Bankruptcy Rules 9027
27 and 9006 extending the deadline by which the Debtor may file notices of removal under Bankruptcy
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1 Rule 9027(a) for the Civil Actions by 185 days from May 23, 2025, through and including
2 November 24, 2025, without prejudice to further extensions.

3 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
4 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
5 For further specifics concerning the Motion and the relief requested, you are encouraged to review
6 the Motion and the supporting evidence, including the supporting Declaration, copies of which may
7 be obtained from the website to be maintained by the Debtor's Claims Agent Omni Agent Solutions,
8 Inc., at <https://www.omniagentsolutions.com/RCASF>. You may also access these documents from
9 the Court's Pacer system (requires a subscription). The web page address for the United States
10 Bankruptcy Court for the Northern District of California is <http://www.canb.uscourts.gov>.

11 The Bankruptcy Court's website provides information regarding how to arrange an
12 appearance at a video hearing. Counsel, parties and other interested parties may attend the hearing
13 via video. Additional information is available on Judge Montali's Procedures page on the court's
14 website. If you have questions about how to participate in a video hearing, you may contact the
15 court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website.
16 The link to the judge's electronic calendar is:
17 <https://www.canb.uscourts.gov/judge/montali/calendar>.

18 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be in
19 writing and filed with the Bankruptcy Court on or before April 24, 2025. Any opposition or response
20 must also be served on the counsel for the Debtor at the above-referenced addresses and the Limited
21 Service List as provided in the Final Order Approving Motion to Establish Notice Procedures and
22 to File Confidential Information Under Seal at ECF No. 227. The updated Limited Service List may
23 be obtained from the Omni Agent Solutions, Inc., website listed above. Failure to file timely
24 opposition and appear at the hearing may constitute a waiver of your objections. Your rights may

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1 be affected. You should read these papers carefully and discuss them with your attorney, if you have
2 one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

3 Dated: April 9, 2025

FELDERSTEIN FITZGERALD WILLOUGHBY
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By: /s/ Jason E. Rios

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Attorneys for The Roman Catholic Archbishop of
San Francisco

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12 Dated: April 9, 2025

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By: /s/ Ori Katz

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Ori Katz

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Alan H. Martin

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